

From: Marsh, Karen
Sent: Wednesday, November 21, 2018 03:20 PM
To: Mia, Marcia
Subject: FW: 0000/0000a Storage Tank Applicability

Any thoughts? Obviously I'm cleaning out my email today.

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Witosky, Matthew
Sent: Monday, October 29, 2018 12:28 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Subject: RE: 0000/0000a Storage Tank Applicability

Hi Karen,

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

An operator performs the determination under 60.5365a(e) during the first 30 days after startup of production. If a storage vessel is uncontrolled, the determination would be performed again if a well attached to the storage vessel was fractured or refractured.

Ex. 5 Deliberative Process (DP)

I think the question arises from 60.5365a(e) (3) (iv) which refers to "...operation that is inconsistent with the conditions..." of having a VRU. But that refers to cases where the VRU is NOT subject to a legally and practically enforceable limit.

Ex. 5 Deliberative Process (DP)

be the case here.

Hope that helps,

Matt

From: Marsh, Karen
Sent: Monday, October 29, 2018 11:31 AM
To: Witosky, Matthew <Witosky.Matthew@epa.gov>
Subject: FW: 0000/0000a Storage Tank Applicability

Thoughts?

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Jamie Nease [mailto:jnease@hlpengineering.com]
Sent: Monday, October 29, 2018 11:00 AM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Subject: 0000/0000a Storage Tank Applicability

Karen-

Can you please direct me to the right person if you are not it?

If a storage tank is determined to be not applicable to 0000/0000a since PTE is less than 6 TPY VOC considering enforceable limits in a permit, would applicability have to be reconsidered after upset conditions?

This is my specific scenario. I have a couple storage tanks at a facility that are controlled by a lit flare. The post-control emissions are made enforceable by a permit and as such the tanks are not subject to the rule since emissions are less than 6 TPY. If there is an upset with the flare, i.e. the flare goes out and tank emission are vented for a short period, should applicability be reassessed to include uncontrolled emissions during that downtime? Or is applicability to the rule made only once, during the 30-day period after start of production?

Thanks for any insight you can provide.

Jamie N. Nease

Air Compliance Manager

HLP Engineering, Inc.

117 Park Center Street | Broussard, LA 70518

PH: (337) 839-1075, ext. 237 | jnease@hlpengineering.com

www.hlpengineering.com

The information contained in this transmission may contain privileged and confidential information. It is intended only for the use of the person(s) named above. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution or duplication of this communication is strictly prohibited. If you are not the intended recipient, please contact the sender by reply email and destroy all copies of the original message.